

EXHIBIT C

Thursday, January 4, 2024 at 12:45:30 Eastern Standard Time

Subject: RE: Freeman v. Wolff -- Requests for data from Dr. Chaski
Date: Wednesday, August 2, 2023 at 7:00:02 PM Eastern Daylight Time
From: Stephen Doniger
To: Benjamin Halperin, Mark Passin, Nancy Wolff, CeCe Cole

External Email

Ben,

We have discussed the below with Dr. Chaski and should be able to get you (a) and (c) within the week. With respect to (b), your representation of what she states on that point is not quite correct, but either way she was referencing work that she did not complete for lack of time and she has not drawn any conclusions regarding the significance of the referenced 700 examples. We are willing to agree that neither discussion nor analysis of those 700 examples will be part of the testimony we plan to elicit from her at trial. I trust that addresses the matter, but let us know if you wish to further discuss.

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From: Benjamin Halperin <BHalperin@cdas.com>
Sent: Friday, July 28, 2023 2:42 PM
To: Mark Passin <mark@reederdmccreary.com>; Stephen Doniger <stephen@donigerlawfirm.com>; Nancy Wolff <NWolff@cdas.com>; CeCe Cole <CCole@cdas.com>
Subject: Freeman v. Wolff -- Requests for data from Dr. Chaski

Mark and Stephen,

Defendants' rebuttal forensic linguist has requested the below items from Dr. Chaski. Please provide them as soon as possible. If there are any items that you are unable or unwilling to provide, please explain so that we can discuss. Also, we expect that all these items are things Dr. Chaski already has on hand, since she states in her report that they exist, and accordingly expect that it will not be expensive (or burdensome) to provide them. If that assumption is wrong for whatever reason, please advise on the approximate cost of producing them before you move forward. Finally, this is to get the ball rolling – we may have additional requests beyond these.

- a. Dr. Chaski says in paragraph 103 that she prepared “scrubbed” and “lemmatized” versions of all the documents she analyzed, including the parties’ works and the ten “baseline” novels. Please provide all of these scrubbed and lemmatized versions in electronic form.
- b. Dr. Chaski states in paragraphs 3 and 61 that she found 700 examples of 6-word “copy-paste plagiarism.” Please correct if we are wrong but we do not see the list of these 700 examples

anywhere in her submission. Please provide.

- c. Dr. Chaski states that she investigated 35 keywords and states in paragraph 100 that "each keyword is central to a *lexical cluster*." Again, please correct if we are wrong, but we don't see where she identified the lexical cluster for each of the 35 keywords. Please have her identify the lexical cluster for each of the 35 keywords.

Thanks,
Ben

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